

1 Lisa A. Rasmussen, Esq.
2 NV Bar No. 7491
3 **The Law Offices of Kristina**
4 **Wildeveld & Associates**
5 550 E. Charleston Blvd., Suite A
6 Las Vegas, NV 89104
7 (702) 222-0007 | Fax (702) 222-0001
8 Lisa@Veldlaw.com

9 Attorney for Barbara Forbes

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 BARBARA FORBES,

16 Defendant.

Case No.: 2:19-CR-241 JAD

**STIPULATION TO CONTINUE
SENTENCING HEARING (First Request)**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas
18 Trutanich, United States Attorney, through Jamie Mickelson, Assistant United States Attorney,
19 counsel for the United States of America, and Lisa Rasmussen, counsel for Barbara Forbes that
20 Ms. Forbes sentencing hearing be continued from its presently scheduled date of May 11, 2020
21 to a future date not less than 60 days. The basis for this stipulation is as follows:

22 1. The COVID-19 pandemic and this Court's general orders prevent the parties from
23 appearing in person for sentencing.

24 2. Defense counsel is of the opinion that an in-person sentencing hearing is
25 appropriate as there have not been any hearings in this matter, nor has there been any litigation
26 and defense counsel believes it is important that the sentencing hearing, the singularly most
27 important event in Ms. Forbes' case, ought to be conducted in a courtroom where the court can
28 be face to face with Ms. Forbes.

1 3. Ms. Forbes has sent funds to pay the substantial restitution in this case and those
2 funds should be received by the clerk's office of this Court within the next two business days if
3 they are not received today.

4 4. Ms. Forbes needs to either divest of her sole remaining pawn shop, located in
5 Grand Junction, Colorado, prior to sentencing, or, she needs to divest of the firearm inventory
6 therein and surrender her federal firearms license (FFL) prior to sentencing. Ms. Forbes had an
7 action plan to accomplish all of this prior to the May 11, 2020 sentencing date by selling the
8 business, all of which has been substantially thwarted by the COVID-19 pandemic and the
9 proposed purchaser of the business is no longer able to purchase the business. Defense counsel
10 is working with Ms. Forbes to otherwise accomplish the necessary goals of no FFL

11 5. The government is not opposed to this request to continue the sentencing hearing.

12 6. This stipulation is not made for the purpose of delay, rather, it is made because
13 the COVID-19 pandemic has created a situation that makes the continuance necessary and
14 appropriate. This is the first request to continue the sentencing date.

15 IT IS SO STIPULATED.

16 Dated this 1st day of May 2020.

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18
19 **LAW OFFICE OF LISA RASMUSSEN,**

20 */s/ Lisa A. Rasmussen*

21 _____
22 LISA A. RASMUSSEN, ESQ.
23 Counsel for Barbara Forbes

24 **NICHOLAS TRUTANICH**
25 **United States Attorney**

26 */s/ Jamie Mickelson*

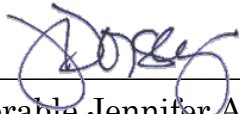
27 _____
28 By: Jamie Mickelson, AUSA
Counsel for the United States

ORDER

Upon the stipulation of the parties, and good cause appearing,

IT IS HEREBY ORDERED that the sentencing hearing presently scheduled for May 11, 2020 shall be continued to July 20, 2020, at the hour of 9:00 a.m.

DATED: 5/4/2020



The Honorable Jennifer A. Dorsey
United States District Judge